

1 SINNOTT, PUEBLA, CAMPAGNE & CURET, APLC

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6 ELECTRIC COMPANY

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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 ELIAS STAVRINIDES,

12 Plaintiff,

13 vs.

14 PACIFIC GAS AND ELECTRIC
15 COMPANY,

16 Defendant.

CASE NO. 4:15-CV-03118-WHA

**RE-NOTICE OF MOTION AND
MOTION TO DISMISS
COMPLAINT BY DEFENDANT
PACIFIC GAS AND ELECTRIC
COMPANY**

**[RE-NOTICED AFTER
PLAINTIFF'S DECLINATION OF
MAGISTRATE JURISDICTION IN
RESPONSE TO OSC]**

Time: 8:00 a.m.

Date: November 19, 2015

Courtroom: 8, 19th Floor

The Honorable William H. Alsup

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23 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

24 PLEASE TAKE NOTICE that on November 19, 2015, at 8:00 a.m. in
25 courtroom 8 of the above-titled court, located at 450 Golden Gate Avenue, San
26 Francisco, California 94102, the Honorable William H. Alsup presiding, defendant
27 Pacific Gas and Electric Company ("PG&E") will and hereby does move this Court
28

1 for an Order, pursuant to Rule 12(b)(6) and Rule 11 of the Federal Rules of Civil
2 Procedure, dismissing the claims in the complaint.

3 This motion was previously noticed and set for hearing on October 15, 2015
4 at 11:00 a.m. before Magistrate Judge Kandis A. Westmore [Dkt. No. 11], and is re-
5 noticed pursuant to the Court's order reassigning case [Dkt. No. 21].
6

7 DATED: October 9, 2015

Respectfully submitted,

8 SINNOTT, PUEBLA,
9 CAMPAGNE & CURET, APLC
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11 By: s/Lindsey A. Morgan
12 BLAISE S. CURET
13 LINDSEY A. MORGAN
14 Attorneys for Defendant Pacific Gas and
15 Electric Company
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1 **PROOF OF SERVICE**

2 I, Lindsey A. Morgan, hereby certify that:

3
4 I am employed in the City and County of San Francisco, California. I am
5 over the age of eighteen years and not a party to this action. My business address
6 is Two Embarcadero Center, Suite 1410, San Francisco, California 94111. I am
counsel of record for the defendant in this action.

7 On October 9, 2015, I caused the **RE-NOTICE OF MOTION TO DISMISS**
8 **COMPLAINT BY DEFENDANT PACIFIC GAS AND ELECTRIC**
9 **COMPANY** to be served upon the parties listed:

10 **VIA U.S. MAIL**

11 Elias Stavrinides
12 11041 Main Street, Ste. 511238
13 Penngrove, CA 94951
(707) 483-7689
14 *PRO SE*

15 **BY MAIL:** I enclosed the document(s) in a sealed envelope or package
16 addressed to the persons at the addresses listed in the Service List and placed the
17 envelope for collection and mailing, following our ordinary business practices. I am
18 readily familiar with Sinnott, Puebla, Campagne & Curet, APLC's practice for
collecting and processing correspondence for mailing. On the same day that the
correspondence is placed for collection and mailing, it is deposited in the ordinary
course of business with the United States Postal Service, in a sealed envelope with
postage fully prepaid.

19 I declare under penalty of perjury that the foregoing is true and correct.
20 Executed at San Francisco, California on this 9th day of October, 2015.

21 By: /s/Lindsey A. Morgan

22 LINDSEY A. MORGAN

23 Attorneys for Pacific Gas and Electric
24 Company
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